

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. 22-mc-_____

Plaintiff,

v.

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

1. \$55,220.00 IN U.S. CURRENCY,
2. MISC. ARTWORK / COLLECTIONS,
3. VARIOUS SILVER AND GOLD COINS,
and
4. MISC. JEWELRY AND PRECIOUS ITEMS,

Defendants,

and

DAVID MICHAEL RAMIREZ,

Claimant.

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until June 6, 2022.

1. On or about December 8, 2021, United States Drug Enforcement Administration (“DEA”) and West Metro Drug Task Force (WMDTF) seized \$55,220.00 in U.S. Currency, miscellaneous artwork/collections, various silver and gold coins, and miscellaneous jewelry and precious (hereinafter “Defendant Property”) items from the Claimant.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Property and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On March 8, 2022, David M. Ramirez filed a claim for the Defendant Property through his attorney, Steven T. Grimshaw.

4. The time has expired for any other person to file a claim for the Defendant Property under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties have commenced settlement discussions and have scheduled additional times to conduct in-person settlement discussions, but will be unable to complete them before the current June 6, 2022 deadline. Accordingly, the parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until September 6, 2022 in order to allow time for settlement discussions.

Dated: June 3, 2022

ANDREW M. LUGER
United States Attorney

s/ Craig R. Baune
BY: CRAIG R. BAUNE
Assistant U.S. Attorney
Attorney ID No. 331727
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415
Phone: 612-664-5600
Craig.baune@usdoj.gov

Date: June 3, 2022

LAW OFFICE OF STEVEN T. GRIMSHAW

s/ Steven T. Grimshaw

STEVEN T. GRIMSHAW, Esq.

Attorney ID No. 180804

309 Clifton Ave

Minneapolis, MN 55403

612-333-2878

Attorney for Claimant

David M. Ramirez